



*Where ideas connect*

Department of Environmental Quality  
Division of Air Quality

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DAQE-IN2919001-03

October 1, 2003

Darren Baker  
Lofthouse Foods Incorporated  
215 North 700 West  
Ogden, UT 84016-460

Dear Mr. Baker:

Re: Intent to Approve: Initial Approval Order for Bakery at Ogden Business Depot, Weber County,  
CDS B; NA; MAINT. Project Code: N2919-001

The attached document is the Intent to Approve (ITA) for the above-referenced project. ITAs are subject to public review. Any comments received shall be considered before an Approval Order is issued.

Future correspondence on this Intent to Approve should include the engineer's name as well as the DAQE number as shown on the upper right-hand corner of this letter. Please direct any technical questions you may have on this project to Mr. Nando Meli. He may be reached at (801) 536-4052.

Sincerely,

Rusty Ruby, Manager  
New Source Review Section

RR:NM:jc

cc: Weber-Morgan Health Department

**STATE OF UTAH**

**Department of Environmental Quality**

**Division of Air Quality**

**INTENT TO APPROVE: Initial Approval Order for Bakery at  
Ogden Business Depot**

**Prepared By: Nando Meli, Engineer**  
**(801) 536-4052**  
**Email: [nmeli@utah.gov](mailto:nmeli@utah.gov)**

**INTENT TO APPROVE NUMBER**

**DAQE-IN2919001-03**

**Date: October 1, 2003**

**Lofthouse Foods Incorporated**

**Source Contact**  
**Evan Nazal**  
**(801) 776-3500**  
**(801) 835-5770 (Cell)**

**Richard W. Sprott**  
**Executive Secretary**  
**Utah Air Quality Board**

### ***Abstract***

***Lofthouse Foods Inc. plans to consolidate three bakeries into one bakery to be located in the Ogden Business Depot at 215 North 700 West, Ogden, Utah. The three bakeries that will be consolidated are currently located at Clearfield, Utah; Ogden, Utah; and Kent, Washington. These three bakeries are being closed to facilitate the relocation of the baking equipment to the new bakery. There will be eight ovens at the new Ogden plant. Five ovens will be moved from the Clearfield plant, one oven will be from the former Ogden plant, and two ovens will be relocated from a bakery in Kent, Washington. In addition to the oven lines, there will be eight flour silos and two sugar silos. There will be two natural gas fired boilers. Weber County is an attainment area of the National Ambient Air Quality Standards (NAAQS) for all pollutants but Ogden is a nonattainment area for  $PM_{10}$  and a maintenance area for CO. New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP) and Maximum Available Control Technology (MACT) regulations do not apply to this source. Title V of the 1990 Clean Air Act does not apply to this source. The emissions, tons per year, will be the following potential to emit totals:  $PM_{10} = 1.90$ ,  $NO_x = 17.10$ ,  $SO_2 = 0.12$ ,  $CO = 14.26$ ,  $VOC = 0.95$ , and  $HAPs = 0.32$ .***

The Notice of Intent (NOI) for the above-referenced project has been evaluated and has been found to be consistent with the requirements of the Utah Administrative Code Rule 307 (UAC R307). Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an Approval Order (AO) by the Executive Secretary of the Utah Air Quality Board.

A 30-day public comment period will be held in accordance with UAC R307-401-4. A notice of intent to approve will be published in the Ogden Standard Examiner on October 4, 2003. During the public comment period the proposal and the evaluation of its impact on air quality will be available for both you and the public to review and comment. If anyone so requests a public hearing it will be held in accordance with UAC R307-401-4. The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated.

Please review the proposed AO conditions during this period and make any comments you may have. The proposed conditions of the AO may be changed as a result of the comments received. Unless changed, the AO will be based upon the following conditions:

#### **General Conditions:**

1. This Approval Order (AO) applies to the following company:

##### Site Office

Lofthouse Foods Incorporated  
Business Depot Ogden  
215 North 700 West  
Ogden, Utah 84016-0460

Phone Number (801) 776-3500  
Fax Number (801) 776-3700

The equipment listed in this AO shall be operated at the following location:

215 North 700 West, Ogden, Weber County

Universal Transverse Mercator (UTM) Coordinate System: UTM Datum NAD27  
4,568.6 kilometers Northing, 416.0 kilometers Easting, Zone 12

2. All definitions, terms, abbreviations, and references used in this AO conform to those used in the Utah Administrative Code (UAC) Rule 307 (R307) and Title 40 of the Code of Federal Regulations (40 CFR). Unless noted otherwise, references cited in these AO conditions refer to those rules.
3. The limits set forth in this AO shall not be exceeded without prior approval in accordance with R307-401.
4. Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved in accordance with R307-401-1.
5. All records referenced in this AO or in applicable NSPS and/or NESHAP and/or MACT standards, which are required to be kept by the owner/operator, shall be made available to the Executive Secretary or Executive Secretary's representative upon request, and the records shall include the two-year period prior to the date of the request. Records shall be kept for the minimum period of two years.
6. Lofthouse Foods Incorporated (Lofthouse Foods) shall install and operate the bakery equipment and shall conduct its operations of the Business Depot Ogden Bakery in accordance with the terms and conditions of this AO, which was written pursuant to Lofthouse Foods's Notice of Intent submitted to the Division of Air Quality (DAQ) on May 21, 2003 and additional information submitted to the DAQ on June 18, 2003, June 26, 2003, July 1, 2003, August 20, 2003, August 21, 2003, and September 17, 2001.
7. The approved installations shall consist of the following equipment or equivalent\*:
  - A. Eight Ovens with individual burners rated at  $1.5 \times 10^6$  BTU/hour (MMBTU/hr)
 

Oven #1 Rating	4.5 MMBTU/hr (three burners)
Oven #2 Rating	4.5 MMBTU/hr (three burners)
Oven #3 Rating	6.0 MMBTU/hr (four burners)
Oven #4 Rating	6.0 MMBTU/hr (four burners)
Oven #5 Rating	3.0 MMBTU/hr (two burners)
Oven #6 Rating	3.0 MMBTU/hr (two burners)
Oven #7 Rating	3.0 MMBTU/hr (two burners)
Oven #8 Rating	3.0 MMBTU/hr (two burners)
  - B. Research and Development Oven
 

Oven Rating	0.065 MMBTU/hr
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C. Eight Flour Silos and two sugar silos

Flour silo each equipped with a 250 cfm Bin Vent  
Sugar silo each equipped with a 750 cfm Bin Vent

D. Two Boilers\*\*

Fuel Type	Natural Gas
Heating Capacity:	3.4 x 10 <sup>6</sup> BTU/hr
	2.6 x 10 <sup>6</sup> BTU/hr

E. One baghouse for general dust control inside the building and will exhaust inside the building\*\*

F. One Parts Washer

G. Emergency Generator

Fuel Type	Diesel
Maximum Electrical Output:	20 kW

\* Equivalency shall be determined by the Executive Secretary.

\*\* This equipment is listed for informational purposes only.

8. All exhaust air from the silos shall be routed through the bin vent filters before being vented to the atmosphere.
9. Lofthouse Foods shall only use leavening agents (such as baking powder) and/or liquid oils that do not produce VOC emissions in the baking process.
10. Lofthouse Foods shall not use fermentation in their baking process.
11. Lofthouse Foods shall notify the Executive Secretary in writing when the installation of the equipment listed in Condition #7 has been completed and is operational, as an initial compliance inspection is required. To insure proper credit when notifying the Executive Secretary, send your correspondence to the Executive Secretary, attn: Compliance Section.

If installation has not been completed within eighteen months from the date of this AO, the Executive Secretary shall be notified in writing on the status of the installation. At that time, the Executive Secretary shall require documentation of the continuous installation of the operation and may revoke the AO in accordance with R307-401-11.

### **Limitations and Tests Procedures**

12. Visible emissions from the following emission points shall not exceed the following values.
  - A. All diesel engines - 20% opacity
  - B. All Baghouses - 10% opacity
  - C. All other points including fugitive emissions - 5% opacity

Opacity observations of emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9.

13. The consumption limit of  $339.0 \times 10^6$  scf natural gas per rolling 12-month period shall not be exceeded. To determine compliance with a rolling 12-month total the owner/operator shall calculate a new 12-month total by the twentieth day of each month using data from the previous 12 months. Records of consumption shall be kept for all periods when the plant is in operation. Natural gas consumption shall be determined by billing records. The records of consumption shall be kept on a monthly basis.
14. The emergency generator shall be used for electricity producing operation only during the periods when electric power from the public utilities is interrupted, or for regular maintenance of the generators. Records documenting generator usage shall be kept in a log and they shall show the date the generator was used, the duration in hours of the of generator usage, and the reason for each generator usage.

### **Fuels**

15. The owner/operator shall use natural gas as a fuel in the ovens and boilers and diesel fuel as a fuel in the generator.

### **Records & Miscellaneous**

16. At all times, including periods of startup, and shutdown, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this Approval Order including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Executive Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed that can affect air emissions on equipment authorized by this AO shall be recorded.
17. The owner/operator shall comply with R307-107. General Requirements: Unavoidable Breakdowns.

The Executive Secretary shall be notified in writing if the company is sold or changes its name.

Under R307-150-1, the Executive Secretary may require a source to submit an emission inventory for any full or partial year on reasonable notice.

This AO in no way releases the owner or operator from any liability for compliance with all other applicable federal, state, and local regulations including R307.

A copy of the rules, regulations and/or attachments addressed in this AO may be obtained by contacting the Division of Air Quality. The Utah Administrative Code R307 rules used by DAQ, the Notice of Intent (NOI) guide, and other air quality documents and forms may also be obtained on the Internet at the following web site:

[http://www.deq.state.ut.us/eqair/aq\\_home.htm](http://www.deq.state.ut.us/eqair/aq_home.htm)

The annual emissions estimations below include point source and do not include fugitive emissions, fugitive dust, road dust, tail pipe emissions, and grandfathered emissions. These emissions are for the purpose of determining the applicability of Prevention of Significant Deterioration, non-attainment area, maintenance area, and Title V source requirements of the R307. They are not to be used for determining compliance.

The Potential To Emit (PTE) emissions for this source the Lofthouse Foods bakery are currently calculated at the following values:

	<u>Pollutant</u>	<u>Tons/yr</u>
A.	PM <sub>10</sub> .....	1.90
B.	SO <sub>2</sub> .....	0.12
C.	NO <sub>x</sub> .....	17.10
D.	CO.....	14.26
E.	VOC.....	0.95
F.	HAPs	
	Formaldehyde .....	0.005
G.	Total HAPs.....	0.32

The Division of Air Quality is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an AO. An invoice will follow upon issuance of the final Approval Order.

Sincerely,

Rusty Ruby, Manager  
New Source Review Section